

As an electrical engineer employed for over 10 years at an internet service provider, I can appreciate the need for improved broadband connectivity, especially in rural areas.

However, connectivity must not come at the expense of severe radio frequency interference to radio amateurs, citizen band operators, short wave listeners and other radio service users.

The American Radio Relay League and other organizations have submitted studies that prove that BPL will cause severe interference to the Amateur and other services. Proponents of BPL have not provided adequate technical studies to refute this. It is my professional opinion that the evidence submitted by the ARRL is irrefutable. As proposed, increased incidental emission standards will result in severe radio frequency interference.

Broadband data services can be delivered via the ISM and U-NII bands, resources that are soon to become more economically feasible with the introduction of 802.16 technology to the marketplace. This technology has a much higher reliability and much lower interference potential to other radio services than BPL, at what will soon be comparable costs.

I strongly urge the commission to keep incidental emission standards at their current levels. The public's need for broadband services is better served with existing options.

Respectfully,

Russell J Dwarshuis
Amateur radio operator KB8U